EXECUTIVE SUMMARY

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Federally-funded Community Development Block Grant (CDBG) Program in the City of Eau Claire is administered by the City's Housing Division. The Federal government provides CDBG Program funding to states, counties and municipalities such as the City of Eau Claire through the U.S. Department of Housing and Urban Development (HUD). The City of Eau Claire was awarded \$520,660 and in addition approximately \$100,000 in Program Income (for total resources of \$620,660) to use towards housing, public services and rehabilitation activities that benefit income eligible City residents. The City of Eau Claire will also receive \$329,068 in HOME Investment Partnership funding for the 2019 program year.

CDBG & HOME funds will be directed towards accomplishing the following primary objectives during 2019:

- 1. Provide decent, safe, sanitary, affordable rental and owner-occupied housing for persons who are income eligible throughout the City;
- 2. Provide public services for persons who are income eligible and families;
- 3. Improve and expand emergency shelters, transitional housing facilities, and supportive services for persons without a permanent home, to improve their living situations.

Annual Action Plan 2019

2. Summarize the objectives and outcomes identified in the Plan

SPECIFIC HOUSING OBJECTIVES

Priority Housing Needs:

The priority Housing Needs identified via the consolidated planning process include:

- Renter households with:
 - household income less than 50% of the median family income (MFI)
 - cost burden greater than 30% of their monthly income
- 2. Owner households with:
 - household income less than 80% of the median family income (MFI)
 - homes that do not meet building code, energy, accessibility, or lead paint standards
- 3. First-time homebuyers with:
 - household income between 50% to 80% of the median family income (MFI)
 - inability to purchase a home

Priority Homeless Needs:

- Affordable Housing
- Transitional Housing
- Emergency Shelter
- Supportive Services
- Health Related care

- Food
- Rental Assistance/Security Deposit
- Job Training/Employment Readiness

Priority Community Development Needs:

Public Facilities & Improvements:

• General public facilities & improvements

Public Services:

- General Public Services
- Youth Services
- Battered and Abused Spouses/Children
- Security Deposits/Rent Assistance
- Employment Training / Readiness
- Crime Awareness
- Health Care Services

Other:

- Direct Homeownership Assistance
- Housing Rehab & Related Programming
- Residential Acquisition for Rehab
- Lead Based Paint Hazards
- CDBG Program Administration

3. Evaluation of past performance

The City of Eau Claire has had past success in implementing all projects included in the plan. These projects have met all timeliness deadlines and have benefited the low/mod population of the City. As reported in the Consolidated Annual Performance Evaluation Report (CAPER) for Program Year 2017, the City:

Housing

- Assisted 1 homebuyer with direct homeownership assistance
- 2 new homeowners received rehabilitation loans to rehab their owner-occupied residential units, including the abatement of lead in 2 of those units
- 5 low/mod homeowners received HOME Weatherization Grants (2 Eau Claire Housing Division & 3 Western Dairyland)
- 2 single family homes were purchased and will be rehabilitated for the Homeownership Program
- 199 Homes were inspected and brought up to code as a part of the Code Enforcement Program
- 1 LMI homeowner received funding from the Alley Improvements Reimbursement program

Public Services

- 45 persons facing domestic violence sought shelter and support services,
- 197 families received case management assistance to help care for their children,
- 1455 persons sought emergency shelter as a result of homelessness,
- 631 received primary health care services from the Free Clinic,
- 1032 persons received meals from the Community Table soup kitchen,
- 33 households received rental assistance with the Tenant Based Rental Assistance program,
- 909 Hmong households received tenant/landlord counseling and translation services,
- 77 Women and minorities received employment & business start-up services,

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

On an annual basis, public input is specifically sought in the following areas:

- 1. Action Plan Public Comment Period a 30-day public comment period is held in April/May upon completion of the CDGB funding process and prior to the Annual Action Plan submission in June. Citizens are invited and encouraged to review the Annual Action Plan and provide comments. Any comments received at the public hearing or during the public comment period are included with the plan.
- 2. A public comment hearing period is held on the Consolidated Annual Performance and Evaluation Report (CAPER) which provides information on the status of performance of CDBG programming and, is held upon completion of the CDBG program fiscal year and completion of the CAPER, in October. Any comments received at the public hearing or during the public comment period are included with the report. Additionally, public notices are published whenever there are any plans and/or report amendments, and plan and/or report submissions seeking public comment. Public comment periods are at least thirty (30) days in length. Public comments are encouraged through meeting attendance or in writing. Citizens who wish to make written comments for consideration by the CDBG application committee may do so by sending their comments to: City of Eau Claire Housing Division, 2020 Prairie Ln, Eau Claire, WI 54703. All written comments shall receive a written response, where appropriate, within ten days after the meeting at which the matter is considered.
- 3. During the 2019 Community Development Block Grant (CDBG) application process, the Housing Division held two technical assistance meetings held on February 14, 2019 at 10:00 a.m. and February 20, 2019 at 4:00 p.m. to help applicants complete their CDBG/HOME applications. The Housing Division also held staff public hearings for comments and questions on the DRAFT 2019 Annual Action Plan by the CDBG/HOME Review Committee. Public Hearings were held April 30, 2019 at 10:00 a.m. and May 2, 2019 at 3:00 p.m.

5. Summary of public comments

Citizen comments and suggestions also would have been solicited in the Public Meeting agenda. Attendees were encouraged to communicate comments and suggestions regarding development of the 2019 CDBG Annual Action Plan to the City of any time during the Citizen's comment period ending May 22, 2019 via telephone, letters, or through the use of e-mail.

Annual Action Plan 2019 Children's Service Society, a Public Service agency, addressed the City Council at the April 22, 2019 Public Hearing to show appreciation for their continued support.

Family Promise of the Chippewa valley, a Public Service agency, addressed the City Council at the April 22, 2019 Public Hearing to also express their appreciation for continued support.

Western Diaryland's Business Startup, an organization requesting funding, attended the public hearing on April 22, 2019 Public Hearing to ask to have funding continued for their program. Funding was cut due to the City Council's emphasis on providing funding to those who provide Affordable Housing.

On May 28, 2019, a representative of Western Dairyland's Business Startup program spoke during the Public Hearing portion of the City Council's legislative session. They asked the City Council to reconsider funding their program.

The City also received a letter from the Eau Claire Area Hmong Mutual Assistance requesting more funding for the Community Liaison position.

The City received no other citizen responses during the Public Meeting or throughout the comment period.

6. Summary of comments or views not accepted and the reasons for not accepting them

Despite efforts to publicize the public hearings/comment period, no further citizen comments were received.

7. Summary

Citizen comments and suggestions were also solicited in the Public Meeting agenda. Attendees were encouraged to communicate comments and suggestions regarding development of the FY 2019, CDBG Annual Action Plan to the City at any time during the Citizen's comment period ending Wednesday, May 22, 2019 via written comments or through the use of e-mail.

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1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency	
Lead Agency	EAU CLAIRE		
CDBG Administrator	EAU CLAIRE	City of Eau Claire Housing Division	
HOPWA Administrator			
HOME Administrator	EAU CLAIRE	City of Eau Claire Housing Division	
HOPWA-C Administrator			

Table 1 - Responsible Agencies

Narrative (optional)

The City of Eau Claire has been an Entitlement Community for the Community Development Block Grant (CDBG) since 1977 and the HOME Program since its inception in 1994. The grants are administered through the City of Eau Claire Housing Division. The Housing Division has the primary responsibility for ensuring compliance with all CDBG and HOME program rules and regulations as well as reporting to HUD.

Consolidated Plan Public Contact Information

Keith D. Johnathan, Administrator City of Eau Claire Housing Division 203 S Farwell Street Eau Claire, WI 54701 Keith.Johnathan@eauclairewi.gov (715) 839-4943

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Eau Claire Housing Division has in the past and will continue to work with the Eau Claire Continuum of Care group and specifically, Jeanne Semb, the coordinator of the group, to discuss issues as they face the Eau Claire Community.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Eau Claire is in constant contact with various agencies to ensure funding priorities are in line with current community development goals. Specifically, the city's various departments, including the City Manager's Office, Housing Authority of the City of Eau Claire, Department of Planning and Community Development and several Community Housing Development Organizations (CHDO). The City is involved in ongoing discussions with the Housing Authority of the City of Eau Claire regarding public housing priorities and needs.

The City of Eau Claire has also worked with the City/County Health Department on various initiatives including Invest Health, HUD's smoking ban and technical assistance to provide a better understanding of funding and how we can continue to positively work together. The Health Department has been very supportive of the Housing Authorities implementation of the ban on smoking.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Housing Authority works with the members of the COC to identify those families and individuals who are in need of housing through referrals and applicant interviews.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Eau Claire does not receive ESG funds.

2.	Describe Agencies, groups, organizations and others who participated in the process
۷.	and describe the jurisdiction's consultations with housing, social service agencies and other entities
	Annual Action Plan

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	EAU CLAIRE HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Authority of the City of Eau Claire were contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.
2	Agency/Group/Organization	BOLTON REFUGE HOUSE
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bolton Refuge House was contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.
3	Agency/Group/Organization	WESTERN DAIRYLAND ECONOMIC OPPORTUNITY COUNCIL
	Agency/Group/Organization Type	Housing Services-homeless Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Western Dairyland was contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.
4	Agency/Group/Organization	FAMILY PROMISE OF THE CHIPPEWA VALLEY
	Agency/Group/Organization Type	Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Family Promise of the Chippewa Valley was contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.

Identify any Agency Types not consulted and provide rationale for not consulting

Because Western Dairyland is the lead agency in the preparation of these applications, they determine which groups to participate in the application process. All groups are given the opportunity to collaborate on applications, as long as they have the capacity.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	WESTERN DAIRYLAND	

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation - 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Eau Claire Housing Division began its citizen's participation process on April 21, 2019 with an ad in the Eau Claire Leader Telegram Newspaper. It was followed by a public hearing that was held on Monday, April 22, 2019 at the Eau Claire City Council Meeting. On April 30 and May 2, 2019, staff public hearings were conducted in the City Council chamber to allow public involvement in the plan development process and comments on the proposed allocations.

Public Notices announcing the Annual Action Plan public hearings and comment periods were published both in the local newspaper, the *Eau Claire Leader Telegram*, and on the City of Eau Claire Community Development webpage. A notice was also sent to the local news media (WQOW & WEAU TV Stations and local radio stations), Government/Public Access Channel, the University of Wisconsin Eau Claire (UWEC), City of Eau Claire Library and the City of Eau Claire City Council members. In addition, the City sends direct email notices to the following organizations:

- Bolton Refuge House
- Catholic Charities
- Chippewa Valley Free Clinic
- Children's Service Society
- Eau Claire Police Department
- Family Promise of the Chippewa Valley
- Hmong Mutual Assistance Association
- The Community Table
- Western Dairyland E.O.C., Inc.
- City of Eau Claire Public Works
- City of Eau Claire Public Health Department
- City of Eau Claire Neighborhood Associations

Citizen Participation Outreach

Sort	Mode of	Target of	Summary of	Summary of	Summary of co	URL (If
	Outreach	Outreach	response/attendance	comments	mments not	applicable)
Ord				received	accepted	
er					and reasons	

Sort	Mode of	Target of	Summary of	Summary of	Summary of co	URL (If
	Outreach	Outreach	response/attendance	comments	mments not	applicable)
Ord				received	accepted	
er				Children's Service Society, a	and reasons	
				Public Service agency,		
				addressed the City Council at		
				the April 22, 2019 Public		
				Hearing to show appreciation		
				for their continued support.		
				Family Promise of the		
				Chippewa valley, a Public		
				Service agency, addressed		
				the City Council at the April		
				22, 2019 Public Hearing to		
				also express their		
				appreciation for continued		
				support. Western Dairyland's		
				Business Startup, an		
				organization requesting		
				funding, attended the public		
			The City of Face Claims hold a mublic	hearing on April 22, 2019		
			The City of Eau Claire held a public	Public Hearing to ask to have		
			hearing for its CDBG/HOME allocations for citizens to comments	funding continued for their		
				program. Funding was cut		
			on the proposed funding by the CDBG/HOME Review Committee.	due to the City Council's		
			This was held at a scheduled City	emphasis on providing		
			Council meeting on April 22, 2019.	funding to those who provide		
			Several people attended the public	Affordable Housing.		
		Non-				
1	Public Meeting	targeted/broa	hearing, including Council Members, Annual Actio Children's Service Society, Family	n Plan	N/A 15	
OMB Co	_	d community 17 (exp. 06/30/2018)	Promise of the Chippewa Valley, and	On May 28, 2019, a		
CIVID CO	11.01140. 2500-01	E. (CAP. 00/30/2010)	Western Dairyland noted the	representative of Western		
			importance of CDBG funds for the	Dairylandâ¿¿s Business		
			Business Startup Program. The City	Startup program spoke		

Sort Ord er	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of co mments not accepted and reasons	URL (If applicable)
2	Newspape r Ad	Non- targeted/broa d community	N/A	No comments received	No comments received	
3	Internet Outreach	Non- targeted/broa d community	N/A	No comments received	No comments received	www.eauclaire wi.gov

Table 4 – Citizen Participation Outreach

EXPECTED RESOURCES

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Eau Claire anticipates receiving the below CDBG Entitlement funds, program income and HOME funds for 2019 to address obstacles to meet underserved needs, foster decent housing, provide public housing improvements and resident initiatives, reduce the number of persons below the poverty line and enhance coordination between public and private housing. The results of these activities will be reported in the Consolidated Annual Performance Evaluation Report (CAPER).

Anticipated Resources

Program	Source	Uses of Funds	Exped	cted Amount	Available Year	4	Expected	Narrative Description
	of Funds		Annual Allocation:	Program Income:	Prior Year Resources:	Total:	Amount Available Remainder of ConPlan	
CDBG	public -	Acquisition						The City of Eau Claire will use the
	federal	Admin and Planning						CDBG funding for various
		Economic						program and projects within the
		Development						city limits of Eau Claire.
		Housing						
		Public						
		Improvements						
		Public Services	\$520,660	\$100,000	\$0	\$620,660	\$620,660	

Program	Source	Uses of Funds	Expe	ted Amount	Available Year	· 4	Expected	Narrative Description
	of Funds		Annual Allocation:	Program Income:	Prior Year Resources:	Total:	Amount Available Remainder of ConPlan	
HOME	public -	Acquisition						The City of Eau Claire will use
	federal	Homebuyer						HOME funds for affordable
		assistance						housing projects.
		Homeowner rehab						
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	\$329,068	\$0	\$0	\$329,068	\$329,068	

Table 5 - Expected Resources - Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

One of the requirements the Housing Authority has is that applicants for the CDBG Public Services grantees have additional sources of funding and not rely solely on the CDBG funds. All grantees that are funded, supplement the CDBG grants they receive with funding from other sources.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Eau Claire will not use publically owned land of property to carry out this 2019 plan.

Discussion

There is a limited amount of publicly owned land. Currently, there are no plans to allow the Housing Division or the Housing Authority to use that property to create any Affordable Housing opportunities. Should any properties become available to us, we will attempt to seize such an opportunity to create housing, providing we have or can obtain the necessary financial resources.

The City of Eau Claire Redevelopment Authority is currently working with several developers who are interested in creating more Affordable Housing within the City limits of Eau Claire. The majority of the proposed projects are apartment driven, with interests in renovating historic buildings and more mixed use private and commercial buildings.

Cannery Trails Residences, LLC is set to develop apartments in the Cannery District located in along the west bank of the Chippewa River in downtown Eau Claire. This first phase will consist of creating approximately 6 market rate units. The second phase will produce 40+ units with 85% to 90% of those units being affordable, through the use of Low Income Housing Tax Credits (LIHTC).

There is also interest with working with a developer, Wired Properties, to create pocket homes within designated LMI neighborhoods. These single family homes would sell for as low as \$90,000 up to \$200,000. They would create a community within the inner circle of the homes to not only create affordable housing, but encourage getting together with neighbors as a small community.

The City is also in talks with other developers that are interested in developing affordable housing in this and other areas of the city.

As a part of the redevelopment, green or LEED certified projects are being requested as a part of the request for proposals from developers.

ANNUAL GOALS AND OBJECTIVES

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve existing	2015	2019	Affordable Housing	Citywide	Affordable	CDBG:	Homeowner Housing
	owner-occupied				,	Housing	\$195,400	Rehabilitated: 11 Household
	housing units					J	номе:	Housing Unit
							\$50,000	
2	Provide opportunities	2015	2019	Affordable Housing	Citywide	Affordable	CDBG:	Direct Financial Assistance to
	for homeownership to					Housing	\$193,100	Homebuyers: 12 Households
	LMI HH							Assisted
3	Provide rent	2015	2019	Affordable Housing	Citywide	Affordable	HOME:	Tenant-based rental assistance /
	assistance to LMI HH			Non-Homeless		Housing	\$196,168	Rapid Rehousing: 50 Households
				Special Needs				Assisted
4	Improve rental	2015	2019	Affordable Housing	Citywide	Affordable	HOME:	Rental units rehabilitated: 2
	housing units for LMI					Housing	\$50,000	Household Housing Unit
	households							Homeless Person Overnight
								Shelter: 50 Persons Assisted
5	Mitigate or prevent	2015	2019	Homeless	Citywide	Public Services	CDBG:	Homelessness Prevention: 2,215
	homelessness						\$47,600	Persons Assisted
6	Provide services to	2015	2019	Non-Housing	Citywide	Public Services	CDBG:	Public service activities other
	assist LMI Persons			Community			\$45,400	than Low/Moderate Income
				Development				Housing Benefit: 2215 Persons
								Assisted
	•			۸ امینصد۸	ction Plan	•		20

Annual Action Plan

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Improve community	2015	2019	Homeless	Citywide	Community	CDBG:	Public Facility or Infrastructure
	facilities serving LMI			Non-Homeless		Facilities	\$15,000	Activities for Low/Moderate
	persons			Special Needs				Income Housing Benefit: 300
				Non-Housing				Households Assisted
				Community				
				Development				
9	Public improvements	2015	2019	Non-Housing	LMI Census	Neighborhood	CDBG: \$800	Public Facility or Infrastructure
	in LMI neighborhoods			Community	Tracts	Revitalization		Activities other than
				Development				Low/Moderate Income Housing
								Benefit: 100 Persons Assisted
								Public Facility or Infrastructure
								Activities for Low/Moderate
								Income Housing Benefit: 20
								Households Assisted
10	Effective	2015	2019	Administration	Citywide	Effective	CDBG:	Other: 5 Other
	administration of					Administration of	\$123,360	
	programs					Programs	номе:	
							\$32,900	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve existing owner-occupied housing units
	Goal Description	The City of Eau Claire will use CDBG and HOME funding to provide installment and deferred loans and grants to LMI homeowners to bring their homes up to HQS and code compliance.
		Residential Housing Rehabilitation
		Lead Remediation
		• Asbestos
		ECHA HOME Weatherization
2	Goal Name	Provide opportunities for homeownership to LMI HH
	Goal	The City of Eau Claire will allocate CDBG and HOME funds to the following to expand and preserve affordable housing:
	Description	Homeownership Program
		HOME CHDO
3	Goal Name	Provide rent assistance to LMI HH
	Goal	The City of Eau Claire will allocate funding to the following to assist LMI renter households:
	Description	Tenant Based Rental Assistance (TBRA)
4	Goal Name	Improve rental housing units for LMI households
	Goal Description	The City of Eau Claire will allocate HOME funds to the following to expand and preserve affordable housing: • HOME CHDO

5	Goal Name	Mitigate or prevent homelessness
	Goal Description	The City of Eau Claire will allocate CDBG funding to area non-profit organizations to provide homeless shelters.
6	Goal Name	Provide services to assist LMI Persons
	Goal Description	The City of Eau Claire will allocate funding to the following non-profit agencies to assist and improve services to LMI persons and families:
		Chippewa Valley Free Clinic – Health Services
		Community Table – Soup Kitchen
		Children's Service Society – Child Abuse Prevention
		Eau Claire Area Hmong Mutual Assistance Association – Housing Liaison
		Eau Claire Area Hmong Mutual Assistance Association - Community Liaison
		Western Dairyland - Business Startup
7	Goal Name	Improve community facilities serving LMI persons
	Goal Description	The City of Eau Claire will allocate CDBG funding to area non-profit organizations to provide homeless shelters.
9	Goal Name	Public improvements in LMI neighborhoods
	Goal Description	The City of Eau Claire will allocate CDBG funds to the Neighborhood Associations for the cost to promote their neighborhood meetings and provide important information to the neighborhood.
10	Goal Name	Effective administration of programs
	Goal Description	Funding will be allocated from CDBG and HOME for administration costs to operate the programs.

PROJECTS

AP-35 Projects – 91.220(d)

Introduction

The City of Eau Claire City Council approved the following projects for the Community Development Block Grant (CDBG) and HOME Investment Partnership Program's 2019 Grant year. The grant year runs August 1, 2019 through July 31, 2020.

Projects

#	Project Name
1	HOUSING REHABILITATION
2	HOMEOWNERSHIP ASSISTANCE
3	RENTAL ASSISTANCE
4	RENTAL REHABILITATION
5	PUBLIC SERVICES - HOMELESS
6	PUBLIC SERVICES - GENERAL
7	CODE ENFORCEMENT
8	NEIGHBORHOOD REVITALIZATION
9	ADMINISTRATION AND PLANNING

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Eau Claire Housing Division will continue to address obstacles to meeting underserved needs by continuing to service applicants on the Housing Authority waiting list for the Public Housing program and other housing programs they have available. Although, this will not satisfy the entire need, it will help as much as possible. Other agencies such as *Western Dairyland, Family Promise of the Chippewa Valley* and *Bolton Refuge House* also receive CDBG and HOME funding to manage Transitional Housing units to provide shelter to homeless families.

The City of Eau Claire Housing Division/Housing Authority is an active participant in the monthly Continuum of Care (COC) meetings. The COC meetings include organizations such as the Eau Claire City-County Health Dept., Western Dairyland, Family Promise of the Chippewa Valley, Bolton Refuge House, Community Table, Salvation Army, United Way, Eau Claire School District, Catholic Charities, and Habitat for Humanity, Women's Way, The Aging and Disability Resource Center, Hope Gospel Mission, Positive Avenues, AIDS Resource Center of Wisconsin and the Housing Authority of the City of Eau Claire.

The City will continue to attend the COC meetings and work with Western Dairyland to conduct a "Point in Time Survey" yearly to gather information on community needs and work to address those needs as necessary.

The Director of the Housing Division is a member of the after-hours committee which is working on a plan to aid those homeless individuals find shelter during the overnight hours during times of extreme temperatures (extreme cold or heat). The goal is to coordinate with service providers, law enforcement and other governmental offices so that when someone is found during times of extreme temperatures they can be taken somewhere safe and comfortable overnight or until the threat of those temperature extremes are over. This also eliminates unnecessary emergency room visits as a place to get out of the cold or heat.

The Director of the Housing Division is the temporary Vice Chair of the monthly Continuum of Care meetings. He will continue in this position until such time elections are held and a new vice chair has been chosen.

The City, along with other government entities (City & County Authorities, Health Department, Police, Human Services) and services providers (Western Dairyland, Beacon House, Lutheran Social Services, Community Table) and Community partners (Churches, JONAH) will continue working with the Eau Claire initiative to end homelessness and consultant Erin Healy in working on current and future "sprints" to end all aspects of homelessness. The current "sprint" involves housing those individuals that are chronically homeless while continuing to connect them the necessary services. This will be discussed more in our next CAPER.

AP-38 Project Summary

Project Summary Information

1	Project Name	HOUSING REHABILITATION
	Target Area	City-wide
	Goals Supported	Improve existing owner-occupied housing units
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$125,000 HOME: \$50,000
	Description	This program will provide no interest loans to low and moderate income homeowners in the City of Eau Claire to make repair improvements to their homes that will improve the condition and increase the value of the home and beautify the neighborhoods.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 11 households will benefit from this program.
	Location Description	City-wide
	Planned Activities	Repairs and improvements that may be funded by this program may include: window and roof replacement, exteriors, lead-based paint hazard mitigation, electrical and heating work, exterior doors, foundation work and insulation. CDBG funds will also be used for the salary of staff delivering the homeowner rehab loan project.
2	Project Name	HOMEOWNERSHIP ASSISTANCE
	Target Area	City-wide
	Goals Supported	Provide opportunities for homeownership to LMI HH
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$193,100
	Description	CDBG funds will be allocated to purchase and rehabilitate single family homes to sell to low-moderate income individuals and provide down payment closing cost assistance to first-time homebuyers.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 12 households will benefit from these programs.

	Location Description	City-wide
	Planned Activities	Single family homes will be purchased and rehabilitated and sold to low-moderate income families. The homebuyer will obtain a mortgage through a bank or mortgage company and purchase the house through direct sale.
3	Project Name	RENTAL ASSISTANCE
	Target Area	City-wide
	Goals Supported	Provide rent assistance to LMI HH
	Needs Addressed	Affordable Housing
	Funding	HOME: \$196,168
	Description	HOME funds will be used to fund the Tenant Based Rental Assistance (TBRA) Program.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 50 individuals and families will benefit from this program.
	Location Description	City-wide
	Planned Activities	Tenant Based Rental Assistance (TBRA) will provide rental assistance to LMI individuals and/or families.
4	Project Name	RENTAL REHABILITATION
	Target Area	City-wide
	Goals Supported	Improve rental housing units for LMI households
	Needs Addressed	Affordable Housing
	Funding	HOME: \$50,000
	Description	Improve rental housing units for LMI families.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 5 families will benefit from this program.
	Location Description	City-wide

	Planned Activities	HOME funds will be allocated to the Eau Claire Hmong Mutual Assistance Association for the purchase of a duplex to be used for Affordable Housing. HOME funds will also be allocated to Bolton Refuge House for the rehabilitation of their homeless shelter to add more rooms for homeless families.
5	Project Name	PUBLIC SERVICES - HOMELESS
	Target Area	City-wide
	Goals Supported	Mitigate or prevent homelessness
	Needs Addressed	Public Services
	Funding	CDBG: \$47,600
	Description	CDBG funds will be allocated to several agencies to mitigate or prevent homelessness.
	Target Date	07/31/2020
Estimate the number and type of families that will benefit from the proposed activities		Approximately 2,215 persons will benefit from this program.
	Location Description	City-wide
	Planned Activities	CDBG funding will be allocated to assist with the operation of the homeless shelters.
6	Project Name	PUBLIC SERVICE - GENERAL
	Target Area	City-wide
	Goals Supported	Provide services to assist LMI Persons
	Needs Addressed	Public Services
	Funding	CDBG: \$45,400
	Description	CDBG funds will be allocated to provide shelters to help LMI individuals and families better connect to resources.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2,215 persons will benefit from this program.
1	Location Description	City-wide

	Planned Activities	CDBG funds will be allocated to assist various public service agencies to provide homeless shelters and programs. The CDBG award will assist with benefits for the shelter hourly employees.
7	Project Name	CODE ENFORCEMENT
	Target Area	City-wide
	Goals Supported	Public improvements in LMI neighborhoods
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$85,400
	Description	The City/County Health Department will receive funding to support the Code Enforcement Program.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 households will benefit from the Code Enforcement Program.
	Location Description	City-wide
	Planned Activities	The City/County Health Department will receive CDBG funding to assist with the costs to operate the Code Enforcement Program.
8 Project Name NEIGHBORHOOD REVITALIZATION		NEIGHBORHOOD REVITALIZATION
	Target Area	LMI Census Tracts
	Goals Supported	Public improvements in LMI neighborhoods
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$800
	Description	Provide public improvement and parks improvement projects in low-moderate income neighborhoods as a part of revitalization.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 500 households will benefit from this program.
	Location Description	Low-moderate income neighborhoods located within the LMI census tracts.
	Planned Activities	CDBG funding will be allocated to neighborhoods located in LMI census tract to assist with cost of advertising neighborhoods meetings.

9	Project Name	ADMINISTRATION AND PLANNING
	Target Area	City-wide
	Goals Supported	Effective administration of programs
	Needs Addressed	Effective Administration of Programs
	Funding	CDBG: \$123,360 HOME: \$32,900
	Description	Provide funding for the overall administration of programs.
	Target Date	07/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 5 people will benefit from these activities.
	Location Description	City-wide
	Planned Activities	CDBG and HOME will allocate funding to assist with the administrative expenses of the programs.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City allocates its funding in terms of two geographical areas: citywide programs and lower income census tract areas. Most activities are citywide in nature and are qualified on the basis of the income eligibility of their participants.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	85
LMI Census Tracts	15

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Eau Claire will use Community Development Block Grant (CDBG) to address high priority needs, which were identified in the 2015-2019 Consolidated Plan; efforts will not necessarily be targeted geographically.

Discussion

The lower income population lives throughout the City and because of the smaller size of the City and its public transit system, most lower income people can participate in programs provided on a citywide basis.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The City of Eau Claire has made creating and maintaining affordable housing within the city a top priority. These goals are addressed throughout the action plan.

One Year Goals for the Number of Households to	be Supported
Homeless	5
Non-Homeless	45
Special-Needs	0
Total	50

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Sup	ported Through
Rental Assistance	50
The Production of New Units	0
Rehab of Existing Units	11
Acquisition of Existing Units	1
Total	62

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City's major housing programs will serve income eligible people through its housing rehabilitation program. The City will also fund the Tenant Based Rental Assistance (TBRA) program which will provide approximately 50 vouchers to LMI individuals.

AP-60 Public Housing - 91.220(h)

Introduction

The City of Eau Claire Housing Authority has, in the past, been designated by HUD as a 'High Performer" agency, and strives to maintain that designation. The PHA has been creative and entrepreneurial in seeking various sources of public and private funding to expand its supply and type of affordable housing, including the acquisition of 20 scattered site family homes with (Neighborhood Stabilization Program) NSP funds, and the development of 3 family homes for transitional housing.

Actions planned during the next year to address the needs to public housing

The PHA has outlined a capital improvement program in its five year plan for 2015-2019 that includes gradual replacements of roofs, appliances, furnaces and air conditioners. The PHA has also stated its intent to conduct a physical needs assessment as part of an effort to improve the sustainability of its housing units.

The Housing Authority is currently in the process of preparing its 5-year plan.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The City provides some funds to local non-profits to help develop housing that is then sold to income eligible households. When Homeownership properties become available, Public Housing tenants are given the opportunity to apply for those units. If the tenant needs to be income eligible and have a good credit history.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

HUD has designated the Eau Claire Housing Authority as a "high performer" for approximately the last 25 years.

Annual Action Plan 2019 AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

There are very few obstacles to addressing the need of chronic homelessness other than insufficient funding. The funding obstacle may be overcome in part due to the amount of Continuum of Care funding that agencies in Eau Claire have received and are reapplying for through the U.S. Department of Housing and Urban Development.

Each homeless agency or provider uses phone calls and e-mails to coordinate services to homeless households in Eau Claire County. Referrals are made directly to these agencies and tend to be made by local social service agencies, food pantries, churches, schools and law enforcement agencies. Self-referral by homeless households directly to homeless service providers is very common. Local agencies, churches and law enforcement agencies are aware of the resources that the agencies have available. If a referral is made to a homeless service provider and that agency is unable to provide assistance, the provider will assist in getting the homeless household to whatever resources are available.

The City will continue to participate in the Continuum of Care to help assess program effectiveness and coordinate referrals and use of resources among the participating agencies.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City will continue to use its marketing resources and those of the Housing Authority to help households and agencies become familiar with the types of resources and programs offered through the City and the PHA.

The goals of the City of Eau Claire are to continue to support efforts of the Eau Claire Continuum of Care group and all other homeless service providers in the surrounding area. In order to reduce homelessness in Eau Claire, all homeless service providers need to continue to collaborate and share ideas and continue networking efforts to promote referrals.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2019 grant year, the City of Eau Claire will provide CDBG and HOME funds for essential services and operations to local emergency shelters and transitional housing facilities. The facilities listed below provide shelter and services to homeless families and children, single parents with children, single men and women and victims of domestic violence who are in a homeless situation.

Bolton House Advocacy Program

Catholic Charities Sojourner House

Family Promise of the Chippewa Valley

Western Dairyland Homeless Haven program

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Activities that will be undertaken during the 2019 grant year to prevent homelessness are:

- Family Promise of the Chippewa Valley will continue to provide emergency shelter and support services to homeless families
- Western Dairyland will continue to provide emergency shelter and support services to homeless families
- Bolton Refuge House will continue to provide shelter and counseling for victims of domestic abuse
- The Housing Authority of the City of Eau Claire has three transitional housing units that will
 provide shelter to homeless families
- Catholic Charities will provide shelter to homeless individuals

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Because the City of Eau Claire Housing Division does not receive and Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or SRO Program funds, a Discharge Coordination Policy is not required.

Discussion

The City is funding a Tenant Based Rental Assistance (TBRA) program in order to help prevent homelessness, as well as help move households from homelessness into a housed status.

Annual Action Plan 2019

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

In the 2019 grant year, the City of Eau Claire will continue to work towards eliminating barriers to affordable housing in the City. Eau Claire supports and funds a number of activities such as translations services and affordable housing and others that are aimed at reducing or eliminating barriers to fair housing for lower-income persons wishing to reside in the City. The City contracted with Cedar Corporation to update the Analysis of Impediments and with their recommendations will continue to work towards eliminating noted barriers.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

There are currently no plans to solicit for any policy changes as mentioned. These are policies that have been in place for years and would be a great undertaking to attempt to work to have those changes made if they could, in fact, be made. We will continue to encourage those "in power" to consider making those changes that are necessary to promote policy, land use controls, zoning ordinances, building codes/fees and charges, in order to promote more affordable housing.

Discussion:

The current climate of the City Council is one of support of affordable housing. While we don't know what form or shape that will take, we will attempt to be included in current and future conversations regarding the topic.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Eau Claire will undertake the following actions during the 2019 Program Year to address the needs and priorities included in the 5-Year Consolidated Plan.

Actions planned to address obstacles to meeting underserved needs

The City of Eau Claire Housing Division will continue to address obstacles to meeting underserved needs by continuing to service applicants on the Housing Authority waiting list with the HOME Tenant Based Rental Assistance (TBRA) program, Public Housing, and other housing programs they have available. Although, this will not satisfy the entire need, it will help as much as possible. Other agencies such as Western Dairyland, Family Promise of the Chippewa Valley and Bolton Refuge House also receive CDBG and HOME funding to manage Transitional Housing units to provide shelter to homeless families.

The City of Eau Claire Housing Division/Housing Authority is an active participant in the monthly Continuum of Care (COC) meetings. The COC meetings include organizations such as Western Dairyland, Family Promise of the Chippewa Valley, Bolton Refuge House, Community Table, Salvation Army, United Way, Eau Claire School District, Catholic Charities, Habitat for Humanity, Women's Way, The Aging and Disability Resource Center, Hope Gospel Mission, Positive Avenues, AIDS Resource Center of Wisconsin and the Housing Authority of the City of Eau Claire.

The City will continue to attend the COC meetings and work with Western Dairyland to conduct a "Point in Time Survey" yearly to gather information on community needs and work to address those needs as necessary.

The City will continue working with the Eau Claire Initiative to end homelessness.

Actions planned to foster and maintain affordable housing

The City of Eau Claire contracted with the Cedar Corporation to update the Analysis of Impediments to Fair Housing Choice. The report is complete and the City of Eau Claire has reviewed the impediments and will address those items of high priority.

The City of Eau Claire will continue to work on addressing, but not limited to, the following identified in the product:

1. Need for Additional Support for Non-English Residents

The City of Eau Claire will continue to work on updating the Hmong and Spanish brochures for the Rehabilitation Program and post them on our website, as well as have them available in the office.

The Hmong Association receives CDBG funding for the Community Liaison and Housing Liaison who provide Hmong language interpretation. The City will continue to work with them to provide interpretation for those with limited English proficiency.

2. Ongoing Need for Additional Funding for Affordable Housing

The City of Eau Claire will again award funding to the Housing Authority of the City of Eau Claire to operate the Tenant Based Rental Assistance program.

The Hmong Mutual Assistance Association will receive CHDO funding through the HOME program to purchase and rehabilitate a multi-family unit to add to the affordable housing stock in Eau Claire.

3. Encourage Minority Families to Purchase Homes

The City of Eau Claire will continue to work with the Realtors Association (R.A.) of the Northwest Wisconsin and Lake Superior Area to and follow up on their efforts to encourage minorities to consider careers in the real estate field.

Eau Claire is home to a large Hmong population. In fact, the Hmong are the largest minority group in the region. As such, they face cultural and language barriers when it comes to seeking and obtaining affordable housing. The City will again continue working with the R.A. to encourage relators of all races and ethnic backgrounds to see to it that the population is properly and adequately served.

Actions planned to reduce lead-based paint hazards

Specific actions that will be taken during the 2019 program year to address lead paint hazards would be:

City of Eau Claire Housing Division's Housing Rehabilitation loan program. This federally assisted program has regulations and requirements to deal with lead based paint hazards. The City of Eau Claire Housing Division has three trained employees that are state licensed as risk assessors/lead inspectors/supervisors by the State of Wisconsin.

The City of Eau Claire Housing Division has, in the past, sponsored lead trainings for all CDBG/HOME and Housing contractors. The City plans to use future CDBG lead remediation funding to offer further Lead Based Paint Remediation training for both contractors and local landlords participating in the Section 8 Voucher Program. We may try this again in the future, but contractors have not been enthusiastic lately about bidding jobs, especially where lead is involved. Some have let their certifications lapse and don't bid our jobs.

The City County Health Department has received CDBG funding to fund an Environmental Health Specialist position, which enforces code compliance. The project involves a systematic housing inspection and housing code enforcement program, which would be administered in the entire area of

the CDBG target area.

The Health Department has three trained employees that are state licensed and has purchased an XRF machine, which has been shared with the City Housing Division.

The Housing Authority also has three employees that are trained in the use of the XRF.

Actions planned to reduce the number of poverty-level families

The City of Eau Claire Antipoverty Strategy focuses primarily on educational and economic development. To be removed from poverty, a person must have not only skills, but also the opportunity to use those skills.

In 2019, the City of Eau Claire is using CDBG funds to help support:

Western Dairyland Business Start-up will receive Community Development Block Grant funding for a business startup program benefiting women and minorities that are low income. Western Dairyland provides people in this program with skills and employment to become successful in the workforce, encourage the starting of their own business and to develop entrepreneurial skills.

Bolton Refuge House Vocational Advocacy was originally implemented to provide an employment advocacy component for victims of domestic abuse and sexual assault receiving services through Bolton Refuge House. The project provides direct assistance in locating and obtaining gainful employment, overcoming childcare barriers, transportation and providing community advocacy and education regarding domestic abuse and sexual assault.

Family Promise of the Chippewa Valley provides emergency shelter to the homeless families. As a part of the program, the clients are provided with case management to help with finding a job and permanent housing.

Housing Authority of the City of Eau Claire provides a mechanism for breaking the poverty cycle through its affordable housing homeownership program for low-income persons.

Actions planned to develop institutional structure

The City will encourage the collaboration of agencies that deal specifically with Community Development and housing objectives such as the Continuum of Care, Eau Claire Coalition for Youth, Eau Claire Board of Realtors, The Chippewa Valley Apartment Association and the Educational Opportunity Center's Partnering Committee.

Actions planned to enhance coordination between public and private housing and social

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service agencies

The City of Eau Claire will continue to be active at the Continuum of Care meetings, which is continually working towards enhancing coordination among agencies.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next	
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to)
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has no	t
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit	
persons of low and moderate income.Overall Benefit - A consecutive period of one,	
two or three years may be used to determine that a minimum overall benefit of 70%	
of CDBG funds is used to benefit persons of low and moderate income. Specify the	
years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Eau Claire does not invest HOME funds to activities beyond what is referenced in Section 92.205 as eligible activities.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
 - 1. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows: The City will provide financial assistance up to \$3,300 in the form of a deferred and forgivable loan. This loan is forgiven 20% each of the five years following the loan until it's completely forgiven after continual occupancy. If the homeowner sells the home within that five-year period, the repayment is pro-rated by the number of years they have lived in the house.
- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Eau Claire will allocate CHDO funding to agencies to purchase and rehabilitated affordable housing units. With each grant, the agency is required to sign a mortgage and promissory note that is filed with the County as a second mortgage on the property. The subrecipient agrees that the note shall become due and payable to the HOME program in the event that either of the following occurs: (a) title to or equitable ownership in the property is transferred to any person or entity other than the subrecipient or (b) the property is no longer occupied predominately by the subrecipient for a housing program occupied by low income persons. In the event that the title to the equitable ownership of the property is occupied predominately by subrecipient for housing programs occupied by low income persons during the affordably period, all payments required under the terms of the note will be forgiven.

In the event of a voluntary or involuntary transfer of the property during the loan term, the subrecipient or CHDO will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided as downpayment assistance in the form of a deferred payment 0% interest loan. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the amount of the HOME subsidy, the subrecipient or CHDO shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds are defined as the sales price

minus superior loan repayment and any closing costs incurred by the homebuyer.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City plans not to fund the refinancing of existing debt with HOME funds.